



January 17, 2018

L. Francis Cissna  
Director  
U.S. Citizenship and Immigration Services  
20 Massachusetts Avenue, NW  
Washington, DC 20529

David Gulick  
District Director  
Honolulu District Office  
U.S. Citizenship and Immigration Services  
500 Ala Moana Boulevard  
Suite 2-403  
Honolulu, HI 96813-4999

RE: Recent H-2B Petitions Filed for a CNMI Employer

Gentlemen,

While I would prefer to introduce myself in person, I must do so in writing. My name is George Hasselback and I have been retained by Imperial Pacific International (CNMI), LLC ("IPI") an employer in the Commonwealth of the Northern Mariana Islands ("CNMI") to secure H-2B visas for several categories of construction workers. Specifically, I have applied for H-2B visas for ten (10) separate positions specifying premium processing. These petitions were mailed to USCIS on January 12, 2018.

There are several reasons that I am taking the somewhat unusual step of writing to you directly about these applications. First, I believe that these applications represent the first time that a CNMI employer has petitioned for H-2B visas. We in the CNMI certainly do not have the breadth of experience with the H-2B visa that our counterparts in Guam have, and I want to make sure that the unique nature of both the CNMI and these applications do not hinder the process and that these applications are given appropriate attention.

Also, given the recent change to the CW-1 program in the CNMI, these H-2B visas are the only avenue through which IPI stands any reasonable chance of completing its facility here in Saipan. IPI is under a very stringent timeline, as it has only until August 31, 2018 to complete this project, that being a little over a year from the time we knew that CW-1 visas would no longer be available for construction workers. If you have not seen the extent of this construction project, I have attached

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a recent progress report that will give you an idea of both the scope of this project and how much work remains to be done. Without access to visas to employ foreign workers, there simply does not appear to be any way a sufficient workforce can be assembled to complete this project. It goes without saying that if this project does not reach completion by the current deadline of August 31, 2018, the CNMI could have a large and potentially dangerous, partially-complete building of immense size in the center of its tourism district.

Finally, I believe that Mr. Gulick possesses a degree of familiarity with the CNMI and its unique issues that is not generally found throughout the United States and particularly within regulatory agencies whose employees may not have even heard of it. With this knowledge and experience, I believe that your oversight would greatly benefit both the employers that apply for H-2B visas and the people who are tasked with reviewing and hopefully approving such applications. This letter is sent particularly in light of the pledge by USCIS to a recent labor delegation sent to Washington D.C. from the CNMI to assist in ensuring the smooth and diligent processing of H-2B applications. I believe that your involvement in this process would be of great help to make good on these promises to support CNMI employers who embrace the H-2B visa program in transitioning away from the CW-1 transitional system.

Therefore, I write in the hopes that you can monitor the progress of these H-2B applications and lend your expertise and experience whenever appropriate to make sure that they are given the best chance of success possible. Again, I reiterate my belief that the H-2B visa applications (both these, and others inevitably to come) are the only remaining avenue that would allow IPI (and other employers to be able to complete the numerous construction projects that were started with CW-1 construction workers who are no longer available.

Thank you for your time and attention in this matter. We look forward to your consideration and assistance.

Please let me know if you have any questions.

Sincerely,



George Lloyd Hasselback, Esq.



**U.S. Citizenship  
and Immigration  
Services**

February 12, 2018

George Lloyd Hasselback  
Managing Member  
Hasselback Law Office, LLC  
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Dear Mr. Hasselback:

Thank you for your January 17, 2018 letter regarding the H-2B Visa Program. Your letter expressed concern on behalf of your client, Imperial Pacific International, LLC, regarding the processing of petitions for the H-2B temporary nonagricultural worker program. The agency understands the impact these work visas may have for your company and the Commonwealth of the Northern Mariana Islands. All petitions received by USCIS are adjudicated on their individual merits and according to the existing regulatory and statutory framework. USCIS will adjudicate these cases as quickly as possible in a way that is consistent with the law.

Please be assured that USCIS appreciates the sensitive nature of H-2B nonagricultural work and is committed to ensuring that the program functions as it was intended.

Thank you again for your letter and interest in this important issue. Should you wish to discuss this matter further, please do not hesitate to contact me.

Respectfully,

A handwritten signature in blue ink, appearing to read "LFC", with a stylized flourish at the end.

L. Francis Cissna  
Director